

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Rural Digital Opportunity Fund)	WC Docket No. 19-126
)	
Connect America Fund)	WC Docket No. 10-90

REPLY COMMENTS OF THE INSTITUTE FOR LOCAL SELF-RELIANCE

I. Introduction

The Institute for Local Self-Reliance (ILSR) mission is to provide innovative strategies, working models and timely information to support environmentally sound and equitable community development. To this end, ILSR works with citizens, activists, policymakers, and entrepreneurs to design systems, policies, and enterprises that meet local or regional needs; to maximize human, material, natural, and financial resources; and to ensure that the benefits of these systems and resources accrue to all local citizens.

II. Auction Timing

ILSR is concerned with suggestions that would involve delaying the auction in order to collect additional data regarding which areas should be included. The Commission should move as rapidly as practical to conduct this auction with the best available data currently at hand. Though additional data may reveal still additional locations that should be eligible, those locations should be dealt with when that information is vetted. Millions of Americans are already suffering with extremely slow and unreliable Internet access because prior Connect America Fund rules allowed providers accepting subsidies to provide slow speeds that have long been outdated. As such, the Commission should be reluctant to delay these auctions. We should not wait to address the overwhelming need simply because we cannot be sure it includes every household that will be eligible once the Commission has collected the necessary data.

Public interest advocates have encouraged the Commission to collect additional, more accurate data for years while those representing the largest firms have found reasons to disagree. The Commission should not further delay this essential Internet expansion because those firms have now found a reason to slowly share the information needed for more accurate maps.

III. Speeds and Weights

ILSR agrees with NTCA that the Commission should promote networks built to last and able to

meet subscriber demand during the entire length of the program, not just the first few years.¹ As such, the FCC should adjust its weighting to more prioritize faster tiers of service and networks that have a clear upgrade path to accommodate all demand over the next 10 years.

ILSR agrees with Conexon² in proposing that after the clearing round, the Commission should continue the auction for a given location only if multiple bidders are contending for the highest performance tier and the lowest weight. After the clearing round, the public interest is best served by the highest quality network, not by potentially shaving some small amount of money off the final bill by embracing a less capable network that will have a higher likelihood of requiring future subsidies to again be competitive.

Respectfully submitted,

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¹ See Comments of NTCA at p. 2.

² See Comments of Conexon at p. 6.